

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W.R. GRACE & CO., *et al.*,) Case No. 01-1139 (JKF)
) (Jointly Administered)
Debtors.)

**REQUEST FOR MATRIX ENTRY AND REQUEST FOR
SERVICE OF NOTICE AND DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, *American Premier Underwriters, Inc.* ("American Premier") request that all notices given or required to be given in these Chapter 11 cases be given and served upon:

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PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes the notices and papers referred to in the bankruptcy rule specified above, and also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile, or otherwise, which affects or seeks to affect in any way the above-captioned Debtors or the property of

the Debtors, or any of the rights or interests held or asserted by *American Premier* with respect to the Debtors or property of the Debtors.

PLEASE TAKE FURTHER NOTICE that this Request pursuant to Bankruptcy Rule 2002 shall not be deemed or construed to be a waiver of any substantive or procedural right of *American Premier*, including without limitation, to: (a) require that where any adversary proceeding is to be initiated against *American Premier* in this or any related case or where any proceeding is to be initiated by complaint against *American Premier* under applicable non-bankruptcy law, service shall be made on *American Premier* in accordance with applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon undersigned counsel is insufficient for such purposes; (b) have final orders in non-core matters entered only after *de novo* review by the United States District Court; (c) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (d) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (e) any other rights, claims, actions, defenses, setoffs or recoupments to which is or may be entitled in law or at equity, all of which rights, claims, actions, defenses, setoffs or recoupments *American Premier* expressly reserves.

Dated: January 13, 2005

BLANK ROME LLP



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